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*Attorneys for Defendants
TeachBK, Inc., Ilya Kiselev
& Andrei Burstev*

*Attorneys for Plaintiff
Miriam Goldberg*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Miriam Goldberg,
Plaintiff,
v.
TeachBK, Inc., *et al.*,
Defendants.)

) Case No.: 3:24-cv-4525
)
) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER FOR REMOTE**
) **HEARING**
)
) Date: November 12, 2024
) Time: 10:30 a.m.
) Courtroom: Room G, 15th Floor
) Judge: Hon. Lisa J. Cisneros
)

Plaintiff Miriam Goldberg and Defendants TeachBK, Inc., Ilya Kiselev, and Andrey Burtsev (collectively, “Defendants”) hereby agree and stipulate as follows:

The parties stipulate and jointly request that the hearing on Defendants' motion to strike Plaintiff's Complaint [ECF No. 28] scheduled for November 12, 2024 at 10:30 a.m. be held remotely. Alternatively, in the event the Court is disinclined to hold the hearing remotely, Plaintiff requests that her counsel, James Slater, be permitted to appear remotely. As grounds,

1 Mr. Slater is scheduled to have a surgical procedure on Friday, November 8, 2024, and will be
2 recovering leading up to the hearing. Defendants do not oppose this alternative request.

3 IT IS SO STIPULATED.

4 Dated: November 7, 2024

Respectfully submitted,

5 SLATER LEGAL PLLC

6 By:/s/ James M. Slater

7 James M. Slater (*admitted pro hac vice*)

8 *Attorney for Plaintiff Miriam Goldberg*

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10 LAW OFFICES OF ALLA V. VOROBETS

11 By:/s/ Alla V. Vorobets

12 Alla V. Vorobets (SBN 258586)

13 *Attorney for Defendants TeachBK, Inc., Ilya
Kiselev, and Andrei Burtsev*

14
15 **ATTESTATION OF CONCURRENCE**

16 I, James M. Slater, am the ECF User whose ID and password are being used to file this
17 **JOINT STIPULATION.** I attest that, pursuant to United States District Court, Northern
18 District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been
19 obtained from counsel for Defendants. I declare under penalty of perjury that the foregoing is
20 true and correct.

21
22 Dated: November 7, 2024

SLATER LEGAL PLLC

23 By:/s/ James M. Slater

24 James M. Slater (*admitted pro hac vice*)

1 **[PROPOSED] ORDER**
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6 Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that
7 the hearing on Defendants' motion to strike [ECF No. 28] be held remotely via Zoom on
8 November 12, 2024 at 10:30 a.m.
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10 HONORABLE LISA J. CISNEROS
11 UNITED STATES MAGISTRATE JUDGE
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